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PLEASE STAMP
AND RETURN
THIS COPY TO
FLETCHER, HEALD & HILDRETH

February 9, 2011

FILED/ACCEPTED

FEB - 9 2011

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* NOT ADMITTED IN VIRGINIA

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification;
Globecom Systems Inc.; Form 499
Filer ID 824200

Dear Ms. Dortch:

Globecom Systems Inc. ("GSI"), by counsel, provides the following CPNI Certification pursuant to 47 C.F.R. § 64.2009(e) and the Public Notice, DA 11-159, released January 28, 2011. Although GSI still does not believe it is required to file such a CPNI Certification, as set forth in its letter in response to the Enforcement Bureau's letter in File No. EB-08-TC-2279, dated September 15, 2008, that matter is still pending and so out of an abundance of caution and in a good faith attempt to comply with all Commission rules and regulations, GSI hereby submits the attached CPNI Certification.

As set forth in the CPNI Certification, GSI has adopted a CPNI Protection Policy and is in compliance with the CPNI rules. Accordingly, GSI submits the CPNI Certification. If you have any further questions, please feel free to contact the undersigned.

Respectfully submitted,

Michelle A. McClure
Counsel to Globecom Systems, Inc.

Enclosure

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Attachment 1: Statement Concerning Company Procedures

Globecomm Systems Inc. ("GSI") does not routinely collect customer proprietary information ("CPNI") but any CPNI it may possess is protected by utilizing the following procedures:

- 1. GSI conducts annual ethics training for all employees. This includes training on proper protection of customer proprietary information. All employees sign a Non Disclosure Agreement upon being hired and the annual training includes reminders of their legal obligations under those NDAs.**
- 2. Any CPNI is to be stored in protected areas and provided only to those with a need to know. To ensure that any CPNI is not accidentally disclosed, CPNI is to be destroyed as soon as it is no longer required for Globecomm to provide service to the customer.**
- 3. GSI will not use CPNI for any purpose other than to provide services to the customer. We will not sell or transfer CPNI to any third party.**
- 4. Customers are to have access to its own CPNI only through a secure web portal that requires a username and password access. Usernames and passwords are only provided to customers who have been authenticated through Contracts or Program Management.**
- 5. GSI's policy is to provide immediate notification to a customer by email if we believe any of the customer's proprietary information has been compromised. Any report from a customer who believes its proprietary information has been compromised is immediately forwarded to the General Counsel's office for investigation.**

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 9, 2011

Name of company covered by this certification: Globecom Systems Inc.

Form 499 Filer ID: 824200

Name of signatory: Julia Hanft

Title of signatory: Vice President and General Counsel

I, Julia Hanft, Vice President and General Counsel, Globecom Systems Inc. (the "Company"), certify that I am an officer of the Company, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et. seq.*

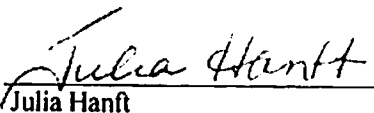
Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et. seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed


Julia Hanft

Vice President and General Counsel
Globecom Systems Inc.

Date

9-Feb-11

Attachment: Accompanying Statement explaining CPNI procedures